REMARKS

In the non-final Office Action dated January 11, 2008 it is noted that: claims 1-11 are pending; the drawings are accepted; and acknowledgment is made of the claim for foreign priority and receipt of all certified copies of the priority documents.

Claims 1-11 have been amended herein to clarify the subject matter. The claimed subject matter is supported by the original disclosure, for example see page 14, line 20 to page 15, line 2 and the network structure indicated as "II" in Fig. 1. As described and shown in Fig. 1 (II), the hierarchically disposed nodes are layered in a tree-shape connection structure having a network structure in which there is no redundant routes to each terminal node. No new matter is entered.

Claim Rejections

Claims 1-11 are rejected under 35 U.S.C. § 102(e) as anticipated by Willars et al. US 7,072,329 (hereinafter Willars). Applicant respectfully traverses this rejection because Willars fails to teach or suggest each and every claimed feature.

For example, claim 1 recites: "a plurality of intermediate nodes layered in a tree-shape connection structure and provided between the top node and the terminal nodes, the tree-shape connection structure having a network structure in which there is no redundant routes to each terminal node."

In contrast Willars, Figs. 2A-2C, discloses the MSC or GPRS node connected to the RNCs. The Interworking node/function, as described in Willars, col. 10, lines 16-38, may be situated as in Figs. 2A-2C or within a node. Therefore, Willars fails to show a plurality of intermediate nodes layered in tree-shape connection structure and provided between the top node and the terminal nodes. Willars only discloses the MSC or GPRS node connected to the RNCs and the Interworking node/function.

Furthermore, Willars Figs. 2A-2C and the corresponding descriptions, for example col. 8, lines 44-46, shows that the RNC nodes are connected to each other by link 29. Willars also describes that the Interworking function having both the ATM and IP interfaces for connecting the RNC nodes. Therefore, Willars fails to teach or suggests the tree-shape connection structure having a network structure in which there is no redundant routes to each terminal node. In fact, Willars shows the redundant

routes through at least the link 29 and the interworking node/function providing a connection between a ATM node and an IP node, so as to connect therebetween, and providing address changing or tunneling via the inter-working node.

Thus, Willars fails to teach or suggest the above mentioned features of independent claim 1.

Claims 2-7 are dependent upon claim 1 and inherit at least the above distinguishing features not found in Willars and are therefore also allowable.

In addition each dependent claim includes features not found in Willars, for example, claim 2 recites: "wherein, each plurality of intermediate nodes transfers user data either received from a node located in the network concerned, or received from a different network and addressed to the network, by use of a broadcast format to the terminal nodes." (Emphasis added).

The Office Action points to Willars col. 9, lines 1-5 as teaching the claimed features. However, a review of Willars fails to find the claimed features.

Willars teaches a downlink broadcast channel from the RNC node to the User Equipment. Applicant claims the intermediate nodes transfers …, by use of a broadcast format to the terminal nodes. Willars RNC node to User Equipment is different from intermediate nodes to terminal nodes. Furthermore, a broadcast format is different from a broadcast channel.

With regard to claim 3, there is no teaching in Willars of the claimed features, for example "… by use of the parameter."

With regard to claim 4, applicant submits that the feature being described as inherent in the Office Action is not so well known that it is instantly recognizable as a fact by one skilled in the art. Particularly, a management table having the IP address correspondingly to a number for identifying the mobile station. Applicant requests that a reference be provided which shows such a feature in order to sustain this rejection.

Independent claims 8 and 9, while different from claim 1, each includes at least the above distinguishing features similar to claim 1. Applicant essentially repeats the above arguments pointing out why claims 8 and 9 are not anticipated by Willars.

Applicant's claim 10 depends from claim 9 and inherits all the features of the base claim.

For at least the foregoing reasons, it is respectfully requested that the rejections of claims 8-10 be withdrawn.

Independent claim 11, while different from claim 1, includes at least the above distinguishing features similar to claim 1. Applicant essentially repeats the above arguments pointing out why claim 11 is not anticipated by Willars. Furthermore, broadcasting of packets is performed at a node disposed on the superordinate side in the hierarchy.

Because broadcasting of packets is performed at a node disposed on the superordinate side in the hierarchy management of mobile stations may be simplified.

As pointed out above the interworking as disclosed in Willars is completely different from the claimed invention recited in claims 1-11 and the rejection under 35 USC 102 should be withdrawn.

Conclusion

In view of at least the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-3894.

Respectfully submitted,

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